

EXHIBIT 1

**Plaintiffs' More Definite Statement as to Defendant
Standard Chartered Bank**

1. Plaintiffs hereby incorporate all allegations and counts contained in the Third Amended Complaint in Burnett, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC), 03 CV 5738 & 03 CV 9849.

Organizational Structure and Purpose of Standard Chartered Bank

2. Standard Chartered Bank, headquartered in the United Kingdom, conducts business in the United States through offices located in New York City at the following address: 1 Madison Avenue, New York, New York 10010.

3. Beginning in September 2001, 9/11 hijackers Mohammed Atta and Marwan Alshehhi retransferred several tens of thousands of dollars back to a bank account under the name Mustafa Ahmed Alhawsawi via Alhawsawi's account with Standard Chartered Bank, UAE.

4. On September 11, 2001, the day of the terrorist attacks on the United States, a deposit of \$16,348.00 was made to this account.

5. Mustafa Ahmed Alhawsawi has been identified as a financial manager for al-Qaeda leader Osama bin Laden.

6. According to FBI Director Robert Mueller, Khalid Shaikh Mohammed shared a credit card with Mustafa Ahmed Alhawsawi.

7. Khalid Shaikh Mohammed has been identified as one of the masterminds of 9/11 and was a key Osama bin Laden aide and al-Qaeda operative captured by police in a raid in Pakistan on March 1st, 2003.

8. In the days before the attacks, Septmber 11 hijacker Nawaf Alhazmi sent an

express-mail package containing a bank debit card that belonged to Khalid al-Midhar, another 9/11 hijacker, to a post-office box in Sharjah, United Arab Emirates, rented in the name of “Alhawsawi.” At the time, the account contained \$10,000.

9. Several more of the September 11 hijackers also sent funds to Mustafa Ahmed Alhawsawi Sharjah, totaling about \$18,000.